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10	IN THE UNITED STATES DISTRICT COURT			
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
12	OAKLAN	D DIVISION		
13				
14	UNITED STATES OF AMERICA,	Case No.: CR 21	-00259 JST	
15	Plaintiff,		N OF JOYCE LEAVITT	
15 16	Plaintiff, v.	IN SUPPORT O REPLY TO MO	N OF JOYCE LEAVITT OF DEFENDANT'S OTION TO SUPPRESS	
	,	IN SUPPORT O	F DEFENDANT'S	
16	v.	IN SUPPORT OREPLY TO MOEVIDENCE Court:	OF DEFENDANT'S OTION TO SUPPRESS  Courtroom 6, 4th Floor	
16 17	v. CAMERON ODOM,	IN SUPPORT O REPLY TO MO EVIDENCE	OF DEFENDANT'S OTION TO SUPPRESS  Courtroom 6, 4th Floor January 7, 2022	
16 17 18 19	v. CAMERON ODOM,	IN SUPPORT O REPLY TO MO EVIDENCE Court: Hearing Date:	OF DEFENDANT'S OTION TO SUPPRESS  Courtroom 6, 4th Floor January 7, 2022	
16 17 18 19 20	v. CAMERON ODOM,	IN SUPPORT O REPLY TO MO EVIDENCE Court: Hearing Date:	OF DEFENDANT'S OTION TO SUPPRESS  Courtroom 6, 4th Floor January 7, 2022	
16 17 18 19 20 21	v. CAMERON ODOM, Defendant.	IN SUPPORT OREPLY TO MOEVIDENCE  Court: Hearing Date: Hearing Time:	Courtroom 6, 4th Floor January 7, 2022 2:00 p.m.	
116 117 118 119 220 221 222	v.  CAMERON ODOM,  Defendant.  I, Joyce Leavitt, declare the following:	IN SUPPORT OREPLY TO MOEVIDENCE  Court: Hearing Date: Hearing Time:	Courtroom 6, 4th Floor January 7, 2022 2:00 p.m.	
116 117 118 119 220 221 222 223	v.  CAMERON ODOM,  Defendant.  I, Joyce Leavitt, declare the following:  1. I am an Assistant Federal Public Def	IN SUPPORT OF REPLY TO MODEVIDENCE  Court: Hearing Date: Hearing Time:	Courtroom 6, 4th Floor January 7, 2022 2:00 p.m.	
16 17 18	V. CAMERON ODOM, Defendant.  I, Joyce Leavitt, declare the following:  1. I am an Assistant Federal Public Def	IN SUPPORT OF REPLY TO MODEVIDENCE  Court: Hearing Date: Hearing Time:  fender appointed to reputation are true and corrections.	Courtroom 6, 4th Floor January 7, 2022 2:00 p.m.  present defendant Cameron et copies of documents	
116 117 118 119 220 221 222 233 224	v. CAMERON ODOM, Defendant.  I, Joyce Leavitt, declare the following:  1. I am an Assistant Federal Public Def Odom in this case.  2. Attached as Exhibit 1 to this declarate	IN SUPPORT OF REPLY TO MODEVIDENCE  Court: Hearing Date: Hearing Time:  fender appointed to reputation are true and corrections are true and corrections.	Courtroom 6, 4th Floor January 7, 2022 2:00 p.m.  present defendant Cameron et copies of documents	
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1	(4) apparent DMV records check for Mr. Odom (Bates 8);
2	(5) Probable Cause for Warrantless Arrest (Bates 10);
3	(6) apparent CRIMS report for Mr. Odom (Bates 11);
4	(7) apparent CLETS report for Mr. Odom (Bates 15);
5	(8) CHP Arrest - Investigation Report (Bates 19);
6	(9) Consolidated Arrest Report (Bates 28);
7	(10) Prison Property Receipt (Bates 29);
8	(11) apparent DMV report for BMW Mr. Odom was driving (Bates 30);
9	(12) Vehicle Report (Bates 32);
10	(13) Incident Detail Report (Bates 33).
11	3. Submitted separately today as Exhibit 2 is a true and correct copy of a CHP dispatch
12	audio recording provided by the government in discovery (Bates 85).
13	4. From conversations with my investigator, I understand that, on the Incident Detail
14	Report the government provided in discovery (Bates 33), "1015" is the code for a
15	suspect in custody; "1029," or "29," is the code for requesting a computer check on a
16	person, vehicle or object; and "1127" is the code for a request to run a driver's license
17	number.
18	5. From conversations with my investigator, I understand that, because CRIMS is an
19	Alameda-County-specific database, a CRIMS check would turn up warrants only
20	from Alameda County, not from any other county. It also is my understanding that
21	CHP officers would have access to the CLETS state-wide database through their
22	MDCs. Using CLETS would allow officers to search for outstanding warrants
23	throughout the state.
24	I declare under the penalty of perjury that the foregoing is true and correct.
25	Executed on November 19, 2021, in Oakland, California.
26	Japa lears
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JOYCE LEAVITT

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